

1 THE HONORABLE BARBARA ROTHSTEIN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 WILDWOOD TOWNHOME OWNERS
14 ASSOCIATION, a Washington Non-Profit
15 Corporation,

16 Plaintiff,

17 v.

18 AMERICAN FAMILY MUTUAL
19 INSURANCE COMPANY, S.I., a Wisconsin
20 Company; and DOE INSURANCE
21 COMPANIES 1-10,

22 Defendants.

23 No.: 2:21-cv-01080-BJR

24 STIPULATED MOTION FOR
25 CONTINUING DISCOVERY CUTOFF,
26 DISPOSITIVE MOTIONS DEADLINE,
AND MOTIONS IN LIMINE DEADLINE

27 Plaintiff Wildwood Townhomes Owners Association (the “Association”) and
28 Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this
29 motion for a continuance of the discovery cutoff and dispositive motions deadline and
30 respectfully request a short extension of the discovery cutoff, dispositive motions deadline,
31 and the Motions in Limine Deadline.

32 Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause
33 and with the judge’s consent.” Good cause exists here because the parties are actively
34 pursuing discovery in this matter but do to witness availability need a brief extension of the

35 STIPULATED MOTION FOR CONTINUING
36 DISCOVERY CUTOFF, DISPOSITIVE MOTIONS DEADLINE, AND
37 MOTIONS IN LIMINE DEADLINE - 1
38 NO.: 2:21-CV-01080-BJR

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1 deadlines to amicably schedule all necessary depositions. For purposes of judicial economy,
 2 the parties propose that the pretrial deadlines be continued pursuant to the below chart to
 3 enable both parties to amicably schedule discovery. The parties respectfully request that the
 4 Court extend the currently scheduled deadline as set forth Below. A proposed order is
 5 included herewith.

Event	Current Deadline	New Deadline
Discovery completed by	2/5/2023	2/24/2023
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	3/7/2023	3/27/2023
Motions in Limine	3/31/2023	5/1/2023

12 The Parties believe that there is good cause under Federal Rule of Civil Procedure
 13 6(b) and Local Civil Rule 10(g) for a continuance of the trial date and related pretrial
 14 deadlines due to the reasons set forth above.

16 DATED: January 10, 2023

Lane Powell PC By: <u>/s/Stephania Denton</u> Stephania Denton, WSBA #21920 dentons@lanepowell.com Karla White, WSBA #59171 martinezwhitek@lanepowell.com Attorneys for American Family Mutual Insurance Company, S.I.	Stein, Sudweeks & Stein, PLLC By: <u>/s/Cortney Feniello</u> Jerry H. Stein, WSBA #27721 jstein@condodefects.com Justin D. Sudweeks, WSBA #28755 justin@condodefects.com Daniel J. Stein, WSBA #48739 dstein@condodefects.com Cortney M. Feniello, WSBA #57352 cfeniello@condodefects.com Attorneys for Plaintiff Wildwood Townhomes Owners Association
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ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the pretrial deadlines be extended as follows:

Event	Current Deadline	New Deadline
Discovery completed by	2/5/2023	2/24/2023
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	3/7/2023	3/27/2023
Motion in Limine	3/31/2023	5/1/2023

No other deadlines or events are altered.

IT IS SO ORDERED this 23rd, day of January 2023.

Barbara J Rothstein

THE HONORABLE BARBARA J. ROTHSTEIN

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2023, a copy of the foregoing ***Document*** and this ***Certificate of Service*** were served on counsel below as noted:

Attorneys for Defendant American Family Mutual Insurance Company, S.I.: via US Mail
Brian T. Kiolbasa via Legal Messenger
Avin Singh via Email
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

SIGNED this 10th day of January, 2023, at Tukwila, Washington.

s/Zach Heafner
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